



Experience the Joy of Brilliant Printed Packaging

March 31, 2009

Laura D. Routh, CHMM
Waste Management Program
Bureau of Environmental Field Services
Kansas Department of Health & Environment
800 W. 24th
Lawrence, Kansas 66046

RE: February 10-11, 2009 Hazardous Waste Compliance Inspection
Robbie Manufacturing Inc.; Lenexa, KS; Johnson County
Violation 4: Failure to adhere to requirements for training (Remains open)
EPA ID Number: KSD054080148

Dear Mrs. Routh

Violation 4: Failure to adhere to requirements for training per K.A.R. 28-31-4(g) (4)/40 CFR 265.16(d) (3). The Company's training documents did not include the following required elements:

- a) Job title for each position related to hazardous waste management and the name of the employee filling each job.

Corrective action: All job titles of persons dealing with hazardous materials and the names of persons filling the positions have been included in the training manual. Attachment included

- b) Not all job descriptions identify the type and amount of training to be given to employee(s).

Corrective action: Job descriptions include statement about annualized training for management of hazardous waste as a requirement. Job descriptions included.

- c) Not all job descriptions described in training plan were produced during inspection (including job description for George Jones)

Corrective action: Job descriptions are included in the training plan. Job descriptions included

- d) Not all job descriptions include a description of hazardous waste duties.

Corrective action: Job descriptions have been updated to include specific responsibilities pertaining to hazardous waste management by position. Job descriptions included

- e) Company did not produce demonstration of annual training for George Jones or Dave Wagner.

500940



RCRA



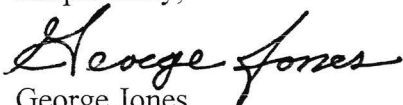
Corrective action: Brian DeCourcy has replaced David Wagner as the secondary Emergency and Hazardous Waste Coordinator. Annual training was conducted on March 26, 2009. Certificate for training attached

Concern 1:

The facility has a single spill kit identified in its contingency plan, located in the ink room. During the inspection, I observed that this spill kit is a significant distance from the other waste storage areas in the plant. I recommended that Robbie Manufacturing consider placing spill control equipment in those areas of the plant where large quantities of hazardous waste are being accumulated or stored.

Response: We have approved the ordering of two (2) additional spill kits to be located at collection point and at the 90 day storage area.

Respectfully,

A handwritten signature in cursive script that reads "George Jones".

George Jones
Robbie Manufacturing Inc.

JOB TITLES & NAMES

Job Title - Print Shop Team Leader

Names of the employees:

- | | |
|-------------------|------------------|
| 1. David Wagner | 4. Larry Kubicki |
| 2. Ron Huddleston | 5. Randy Reno |
| 3. Steve Johnson | |

Job Title - Ink Technician

Names of the employees:

1. Isidro Alarcon
2. Kent Cobel
3. Irwin Battle

Job Title – Changeover Coordinator:

Names of the employees:

- | | |
|-------------------|----------------|
| 1. Jamie Russell | 6. Reese North |
| 2. Jason Grinter | |
| 3. Steven Monreal | |
| 4. Lonnie Kubicki | |
| 5. Mike Jones | |

Assistant Press Operator:

Names of the employees:

- | | |
|--------------------|--------------------|
| 1. Antoine Deloney | 6. Mario Hernandez |
| 2. Pat McGathy | 7. Catina Johnson |
| 3. Jesse Monreal | |
| 4. Romeo Acosta | |
| 5. Victor Romero | |

Press Operator:

Names of the employees:

- | | | |
|-------------------|----------------------|---------------------|
| 1. Troy Robinson | 6. Andy Cumbia | 12. Brett Hawley |
| 2. Brett Jackson | 7. Curtis Wilson | 13. Mark Macauley |
| 3. Brett Hawley | 8. David Haynes | 14. Kim Fischer |
| 4. Eron Simon | 9. Keith Stephens | 15. Brett Jackson |
| 5. Raul Hernandez | 10. Reggie Armstrong | 16. Cory Rutherford |
| | 11. Tim Kienzle | |

Mounter/Proofer:

Names of the employees:

1. Donna Morrison
2. Tim O'Conner
3. Steve Simms
4. Richard Starrett

Plate Room Utility:

Names of the employees:

1. Frank Umstead
2. Debbie Johnson

APPENDIX C

WRITTEN JOB DESCRIPTIONS

WRITTEN JOB DESCRIPTIONS

The job descriptions for the Print Shop Team Leader, Ink Technician, Changeover Coordinator, Assistant Press Operator, Press Operator, Plate/Mounter, Plate Room Utility and Facilities and Environmental Compliance Leader, are on file with the Human Resource Department.

Position Description

Print Shop Team Leader - Second and Third Shift

Robbie Manufacturing

11/12/04

FUNCTION: To plan and oversee implementation of quality produced printed products. To maintain a safe working environment and to deal with team members fairly and honestly.

RESPONSIBILITIES:

1. Perform a quality check per press per job every day.
2. Be on the floor 15 minutes before and 15 minutes after shift change every day and 70% of the rest of the time.
3. Review the daily press report looking for trends and unusual items.
4. Ensure every operator and assistant reads the daily press report and understands its importance.
5. Review the weekly press reports with the operators focusing on the expected outcomes.
6. Respond immediately to job approvals, no press should wait more than 5 minutes for you to get there.
7. Provide a quality printed product. Set standards and communicate and implement thorough training and coaching of personnel.
8. Set the standard for safety and insure our team members are performing in a safe manner.
9. Proactively review the monthly P&L for variances to budget and explain and rectify unfavorable trends.
10. Insure team members have the proper hazardous waste training to perform their job safely.
11. Insure team members receive annual Hazardous Waste training as outlined in our Hazardous Waste Training Program.
12. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
13. Select, hire, and oversee training of individuals required to meet necessary production.
14. Submit thorough and complete budgets annually, in an attempt to forecast financial requirements for the upcoming year.
15. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.
9. Coach/develop team members and provide leadership that results in continuous improvement.
10. Develop internal and external resources resulting in improved customer relations, product development, order fulfillment, value added information, quality and cost reduction.
11. Achieves high impact results in product innovation, quality improvement and/or costs reduction.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Production environment with exposure to identified hazards such as dust, noise, etc. Overtime will be required.

MINIMUM QUALIFICATIONS:

A Bachelor's degree in Business, or related field, AND a minimum of three years of solid leadership experience in a manufacturing environment with exposure to all aspects of leadership (training, development, coaching, budgeting, etc.) is required; OR, an equivalent combination of education and/or experience.

Print Shop Team Leader - Second and Third Shift

11/12/04

KNOWLEDGE, SKILLS AND ABILITIES:

Able to exemplify professional behavior in all aspects of their position.

Demonstrated leadership skills.

Able to function effectively in a fast paced, dynamic environment.

Excellent interpersonal skills.

Strong organizational skills.

Detail oriented.

Tactful, mature and able to get along with diverse personalities.

Ability to operate basic office equipment such as a phone, fax, copier, and printers.

Computer literate with a strong knowledge of software such as Microsoft Office.

Thorough understanding of process printing.

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

FUNCTION: To supply color correct inks in a timely and quality manner to the print shop.

RESPONSIBILITIES:

1. Supply color correct inks to presses as required.
2. Staging inks for presses.
3. Maintain, and utilize work off inks when practical.
4. Develop new color formulations as required by customer specifications.
5. Maintain ink dispensing equipment.
6. Maintain ink inventories to ensure adequate supply with minimal inventory cost for the company.
7. Responsible for determining when ink has become contaminated or dirty where it can no longer be used as colorant, at which time the ink becomes a Hazardous Waste.
8. Ensure Hazardous Waste collection drum is closed after emptying waste ink into the drum.
9. Check Hazardous Waste Manifest and Land Band for completeness, accuracy and sign the documents.
10. Load 55 gallon drums and 350 gallon totes containing "Hazardous Waste" for shipment to be recycled.
11. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
12. Maintain appropriate control system (color control, etc.).
13. Provide periodic reports relating to inks and solvents as required (VOC reports, ink and solvent usage, ECT.)
14. Keep work area clean and safe.
15. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions
9. Develop internal resources resulting in improved relations, product development, order fulfillment, value added information, quality and cost reduction.

REPORTING RELATIONSHIPS:

This position functions under the direct leadership of the Inkroom Team Lead.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as solvents, dust, noise, etc. Some overtime will typically be required. Extended CRT viewing.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, and experience in color control and ink formulation with exposure to all aspects of flexo printing, training, development, coaching, etc. is required; or an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to exemplify professional behavior in all aspects of their position.
Flexo press trouble shooting skills.
Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.
Strong organizational skills.
Detail oriented.
Tactful, mature and able to get along with diverse personalities.
Ability to operate basic office equipment such as a phone, fax, copier, and printers.
Computer literate with a strong knowledge of software such as Microsoft Office.

Position Description

Ink Technician

Robbie Manufacturing

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

SIGNATURE

DATE

(PRINT NAME)

Changeover Coordinator

03/24/09

JOB FUNCTION: To assist in the press changeover process and minimize time required to perform a press changeover.

RESPONSIBILITIES:

1. Ensure mounted cylinders are available and at press prior to the start of a changeover.
2. Assist in ensuring appropriate ink supply is available to press at changeover.
3. Assist mouter/proofer with preparing appropriate cylinders and gears for print orders.
4. Ensure appropriate level of inventory is available at press.
5. Maintain solvent distillation process included recycling waste ink and storage of clean solvent, operation of solvent recycler and supplies.
6. Ensure Hazardous Waste drum and tote labels are complete and accurate.
7. Ensure closed drums of Hazardous Waste do not leak and drums are closed in accordance with DOT regulations.
8. Responsible for moving full drums of Hazardous Waste from collection point to the 90 day storage area.
9. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
10. Assist in operating presses as required.
11. Assist in training new print shop hires.
12. Maintain an organized, clean work area at all times.
13. Work safe and follow procedures as stated in Safety Policy Manual. Report any potential safety hazards to your team leader.
14. Work in clean up room and maintain wash tank.
15. Prepare waste ink and solvent drums for disposition.
16. Return properly labeled ink kits to ink room or staging area.
17. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, etc. Will be trained in knowledge of hazardous waste and its disposal. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, AND a minimum of one year of press operator experience is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.

Excellent interpersonal skills.

Detail oriented.

Able to work efficiently and effectively w/o direct supervision

Tactful, mature and able to get along with diverse personalities.

Position Description

Changeover Coordinator

03/24/09

Robbie Manufacturing

Ability to operate basic production equipment.

Computer literate with a knowledge of software such as Microsoft Office.

Must be able to stand for 8 hours per day.

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

Assistant Press Operator

FLSA Status: Non-exempt

JOB FUNCTION: To assist in the production of quality printed film in the safest, most productive, and efficient method.

RESPONSIBILITIES:

1. Assist press operator to set up press run in the most efficient manner.
2. Assist press operator and learn to operate press to be as productive and efficient as possible.
3. Maintain inks, solvent, film and cores in adequate order to perform requirements of job being produced.
4. Must be able to read and interpret specifications on job envelope and help ensure specifications are met.
5. Maintain color control; assist in keeping clean, sharp print.
6. Inform press operator of problems with material.
7. To maintain an organized, clean department, including equipment, ink storage, cleanup room and work area at all times.
8. Move and empty 5 gallon kits of solvent that has been determined to be a "Hazardous Waste" into Collection drums.
9. Ensure collection drums of Hazardous Waste are closed after emptying solvent into the drum.
10. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
11. Provide information and status of job being performed to the following shift on press.
12. To read and follow procedures detailed in the Assistant Press Operator Training Manual.
13. To work safe and follow procedures as stated in Safety Manual. Report any potential safety hazards to your team leader.
14. All other duties as assigned.
15. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position reports directly to the assigned press operator and to the Print Shop Shift Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, solvents etc. Will be trained in knowledge of hazardous waste and its disposal. Overtime may be required. Repeated lifting while palletizing customer orders.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent. Prior production or manufacturing experience is preferred.

KNOWLEDGE, SKILLS AND ABILITIES:

- 1) Must have the ability to read and comprehend the procedures detailed in the Assistant Press Operator Training Manual and the Safety Manual.
- 2) Must be able to perform basic arithmetic functions (addition, subtraction, multiplication, and division, and manipulate fractions) related to press operation and ink inventory.
- 3) Must be able to read and use a tape measure.
- 4) Must be able to complete all assessments in the Assistant Press Operator Training Manual within two weeks of start date while performing all press functions.
- 5) Able to function effectively in a fast paced, dynamic environment.

Position Description

Robbie Manufacturing

Assistant Press Operator

FLSA Status: Non-exempt

- 6) Excellent interpersonal skills.
- 7) Detail oriented.
- 8) Tactful, mature and able to get along with diverse personalities.
- 9) Ability to operate basic production equipment (core cutter, ink dispensing system.)

PHYSICAL REQUIREMENTS:

Must be able to stand for 8 hours per day.

Ability to repeatedly stoop, bend, and twist.

Repeated lifting while unloading printed rolls and palletizing customer orders.

Ability to repeatedly load/unload film rolls of up to 60 lbs.

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

(Print Name)

Date

Signature

FLSA Status: Non-exempt

JOB FUNCTION: To produce quality printed film in the most productive and efficient method.

RESPONSIBILITIES:

1. Operate and set up press to run in the most efficient manner.
2. Maintain legible and accurate daily production logs.
3. Interpret specifications from job envelope and insure finished rolls meet those specifications.
4. Maintain color control, clean, sharp print.
5. Report any problems with materials including film, ink, solvents to print shop team leader.
6. Minimize scrap.
7. Responsible for determining when solvent at the presses, used for cleaning, become too dirty to continue using for cleaning purposes. At which time the dirty solvent becomes a Hazardous Waste.
8. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
9. Provide information and status of job being performed to the following shift of press.
10. Inspect equipment during work shift and report potential problems to maintenance and team leader.
11. To maintain an organized, clean department, including equipment, ink storage, cleanup room and work area at all times.
12. To work safe and follow procedures as stated in Safety Policy Manual. Report any potential safety hazards to your team leader.
13. All other duties as assigned.
14. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, Will be trained in knowledge of hazardous waste and its disposal. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, AND a minimum of one year of press operator experience is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.
Excellent interpersonal skills.
Detail oriented.
Tactful, mature and able to get along with diverse personalities.
Ability to operate basic production equipment.

PHYSICAL REQUIREMENTS:

Must be able to stand for 8 hours per day.
Ability to repeatedly stoop, bend, and twist.
Repeated lifting while unloading printed rolls and palletizing customer orders.
Ability to repeatedly load/unload film rolls up to 60 lbs.

Position Description

Press Operator

Robbie Manufacturing

FLSA Status: Non-exempt

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

Signature

Date

Print Name

FLSA Status: Non-exempt

JOB FUNCTION: To mount plates for printing, exercising care and quality in mounts as to provide the best possible printing at the press.

RESPONSIBILITIES:

1. Interpret specifications from job envelopes and mount plates for printing.
2. Ensure plates are mounted correctly and built up properly.
3. Be able to order plates as outlined in emergency plate procedure.
4. Deliver plates to plate inventory coordinator for storage.
5. Prepare cylinders and gears as needed for upcoming jobs. Inspect cylinders and gears for defects and report to print shop team leader.
6. Maintain organized cylinder and gear racks.
7. Pull plates and sleeves for orders when needed.
8. Demount cylinders as necessary. Inspect and maintain demount machine.
9. Determine when solvent is too dirty to continue using for the mounting process at which time the solvent used in the mounting process will become a "Hazardous Waste."
10. Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
11. Inspect equipment during work shift and report potential problems to maintenance and team leader.
12. Maintain an organized, clean work area at all times.
13. Work safe and follow procedures as stated in Safety Policy Manual. Report any potential safety hazards to your team leader.
14. Other duties as assigned.
15. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader.

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, etc. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma or equivalent, AND a minimum of one year of press operator experience is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.

Excellent interpersonal skills.

Detail oriented.

Tactful, mature and able to get along with diverse personalities.

Ability to operate basic production equipment.

FLSA Status: Non-exempt

Must be able to stand for 8 hours per day.

Ability to operate overhead hoist system to move cylinders weighing in excess of 200 lbs.

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

3/24/09

JOB FUNCTION: To inspect, care and maintain inventory of plates (loose and sleeve mounted).

RESPONSIBILITIES:

- 1) Perform duties of plate care and handling including, but not limited to cleaning, stripping and inventory of plates.
- 2) Handling of Colorkeys and Proofs, including staging and returning Colorkeys and Proofs to the appropriate racks when the presses are done with them.
- 3) Perform certain cleaning and organizing for AIB guidelines.
- 4) Determine when solvent used for plate cleaning is too dirty to continue using for cleaning purpose, at that time the solvent will become a "Hazardous Waste"
- 5) Participate in and complete training for Hazardous Waste, as outlined, in Section 3 of our "Hazardous Waste Training Program" within 6 months of hire date and complete ongoing annual training.
- 6) Perform other department duties as assigned

EXPECTATIONS:

1. Must be able to work effectively without close supervision.
2. Perform responsibilities to expected outcomes.
3. Follow through on commitments in a complete and timely manner.
4. Participate actively in the management of the business through team involvement.
5. Identify and participate in learning activities that promote personal and professional growth.
6. Experiment with new processes and ideas to create innovation and continuous quality improvement.
7. Take risks and learn from resulting successes and mistakes.
8. Communicate openly, truthfully and compassionately with respect for individual differences.
9. Listen actively to understand before being understood and strive for win-win solutions.

REPORTING RELATIONSHIPS:

This position functions under the direction of the Plateroom Coordinator and reports to the Print Shop Team Leader.

WORKING CONDITIONS:

Normal production environment with regular exposure to hazards such as dust, noise, solvents, etc. Overtime may be required.

MINIMUM QUALIFICATIONS:

A high school diploma/equivalent, OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to function effectively in a fast paced, dynamic environment.

Detail oriented.

Tactful, mature and able to get along with diverse personalities.

Ability to operate basic production equipment.

Must be able to stand for 8 hours per day.

Ability to lift up to 58 lbs repetitively.

Requires repetitive squatting.

Ability to push/pull up to 51 lbs repetitively.

Requires repetitive pinching.

Position Description

Plate Room Utility

Robbie Manufacturing

3/24/09

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

Signature

Date

Print Name

Facilities and Environmental Compliance Leader

10/20/04

FUNCTION: To lead the functions of the engineering, maintenance and manufacturing development departments ensuring that the most economical and feasible method is utilized for each project.

RESPONSIBILITIES:

1. Lead manufacturing development projects to a successful completion, in accordance with budgets.
2. Develop skills of team members, in particular, of those directly leading.
3. Ensure company is in compliance with Kansas Class I Operating Permit, Kansas "Hazardous Waste" Regulations and U.S. Department of Transportation Regulations
4. Provide printing expertise in a way to significantly improve profitability.
5. Ensure maintenance facilities and grounds is being done in a timely, complete and economical manner.
6. Oversee production scheduling function.
7. Oversee outside janitorial services.
8. Proactively review the P&L for variances to budget and explain and rectify unfavorable trends.
9. Oversee manufacturing construction projects to a timely completion, in accordance with budgets.
10. Follow procedures as stated in the Good Manufacturing Practices manual and perform various cleaning and inspection duties to maintain AIB compliance as assigned. Report any potential violations of GMP policies to your team leader

EXPECTATIONS:

1. Perform responsibilities to expected outcomes.
2. Follow through on commitments in a complete and timely manner.
3. Participate actively in the management of the business through team involvement.
4. Identify and participate in learning activities that promote personal and professional growth.
5. Experiment with new processes and ideas to create innovation and continuous quality improvement.
6. Take risks and learn from resulting successes and mistakes.
7. Communicate openly, truthfully and compassionately with respect for individual differences.
8. Listen actively to understand before being understood and strive for win-win solutions.
9. Coach/develop team members and provide leadership that results in continuous improvement.
10. Develop internal and external resources resulting in improved customer relations, product development, order fulfillment, value added information, quality and cost reduction.
11. Achieves high impact results in product innovation, quality improvement and/or costs reduction.

REPORTING RELATIONSHIPS:

This position functions with the direct leadership of the Vice-President of Operations.

WORKING CONDITIONS:

Normal office environment with minimal exposure to hazards such as dust, noise, etc. Overtime will typically be required. Extended CRT viewing.

MINIMUM QUALIFICATIONS:

A Bachelor's degree in Business, or related field, AND a minimum of three years of solid leadership experience with exposure to all aspects of leadership (training, development, coaching, budgeting, etc.) is required; OR, an equivalent combination of education and/or experience.

KNOWLEDGE, SKILLS AND ABILITIES:

Able to exemplify professional behavior in all aspects of their position.

Demonstrated leadership skills.

Able to function effectively in a fast paced, dynamic environment.

Excellent interpersonal skills.

Strong organizational skills.

Detail oriented.

Tactful, mature and able to get along with diverse personalities.

Ability to operate basic office equipment such as a phone, fax, copier, and printers.

Computer literate with a strong knowledge of software such as Microsoft Office.

This position description is meant to describe the typical kinds of duties or difficulty level that may be required of positions with this title. The use of a particular expression shall not limit or exclude other duties or difficulty levels not mentioned. This position description is not meant to limit or modify Robbie's right to assign, direct or control the work assigned to this position.

Position Description

Facilities and Environmental Compliance Leader

10/20/04

Robbie Manufacturing

Signature

Print Name

Date

TYPE AND AMOUNT OF TRAINING

The Print Shop Team Leader, Ink Technician, Changeover Coordinator, Assistant Press Operator, Press Operator, and the Primary Emergency Coordinators will receive the annual review training outlined in Section 3 of this manual. Any new employee will receive the same training outlined in Section 3 of this manual.

Trinity, will train the Secondary Emergency and the Hazardous Waste Coordinator. The training includes the information outlined in this manual.

Certificate of Completion

This is to certify that

Brian DeCourcy

has successfully completed the course

Hazardous Waste Refresher Training

RCRA Overview

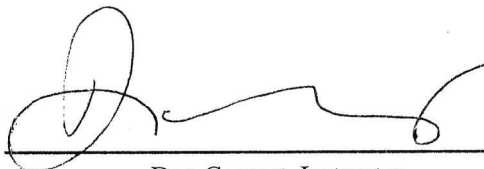
Personal Training (40 CFR 265.16)

Universal Waste (40 CFR 273)

Used Oil (40 CFR 279)

Site Specific Contingency Plan Review

March 26, 2009
(8.0 hours)



Don Gansert, Instructor

Trinity^Δ
Consultants

Certificate of Completion

This is to certify that

George Jones

has successfully completed the course

Hazardous Waste Refresher Training

RCRA Overview

Personal Training (40 CFR 265.16)

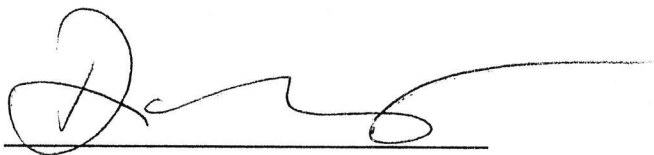
Universal Waste (40 CFR 273)

Used Oil (40 CFR 279)

Site Specific Contingency Plan Review

March 26, 2009

(8.0 hours)



Don Gansert, Instructor

Trinity Δ
Consultants

Date: 3/26/09
Instructor: Don GANSE
Length of Training: 8-hrs.

**Agenda
For
Hazardous Waste Training**

Robbie Manufacturing, Inc.

- 1-Hazardous Waste Training Class
 - a. Power Point Presentation
 - b. Binder of Power Point Presentation handed to the attendees
 - c. Review Material Safety Data Sheets (MSDS)
 - i. Solvent
 - ii. Typical Ink used on site
 - d. Review Emergency Contingency Plan